

REMARKS

Favorable reconsideration of this application, in light of the following discussion, is respectfully requested.

Claims 1-18, 20, and 21 are currently pending. No claims have been amended herewith.

In the outstanding Office Action, Claims 1-18, 20, and 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,397,080 to Viktorsson et al. (hereinafter “the ‘080 patent”) in view of U.S. Patent No. 6,484,037 to Schmidt et al. (hereinafter “the ‘037 patent”).

Applicants wish to thank the Examiner for the interview granted Applicant’s representative on June 10, 2004, at which time Claim 1 was discussed and arguments in support of patentability were discussed. In particular, Applicant’s representative presented arguments that the ‘080 and ‘037 patents fail to disclose virtual mobile telephones. However, no agreement was reached, pending the Examiner’s further consideration of the claims upon formal submission of a response to the outstanding Office Action.

Claim 1 is directed to a conversation support system for supporting a plurality of users in having a virtual conversation in a shared virtual space built and provided on a computer network, comprising: (1) enrolling means for enrolling an avatar of a logged-in user into the shared virtual space; (2) imparting means for imparting a virtual mobile telephone to each avatar in the shared virtual space, the virtual mobile telephone being usable within the shared virtual space; (3) determination means for determining, in response to a call for a virtual mobile telephone, whether a calling party originated the call from a telephone in the shared virtual space, from a telephone in another virtual space, or from a telephone in a real world; and (4) connecting means for executing connection processing in accordance with the determination made by the determination means.

Regarding the rejection of Claim 1, the Office Action asserts that the '080 patent discloses everything in Claim 1 with the exception of the determination means, and relies on the '037 patent to remedy that deficiency.

The '080 patent is directed to a removable memory card that stores information about avatar characteristics for use in a virtual reality environment. In particular, as shown in Figure 1, the '080 patent discloses a system in which a SIM card containing avatar information may be inserted into an access terminal, e.g., the mobile station 101, allowing a called station 103 to display an avatar based on the avatar information stored on the SIM card. The '080 patent discloses a system having the same functionality as caller ID, except that an icon representing the calling subscriber is transferred and displayed on the mobile station of the called subscriber.¹ However, Applicants respectfully submit that the '080 patent fails to disclose imparting means for imparting a virtual mobile telephone to each avatar in a shared virtual space, the virtual mobile telephone being usable within the shared virtual space. While the '080 patent discloses the use of mobile telephones on which an avatar may be displayed, the '080 patent does not disclose imparting a virtual mobile telephone to an avatar in a shared virtual space, as recited in Claim 1. Moreover, as admitted in the Office Action, the '080 patent fails to disclose the determination means recited in Claim 1.

The '073 patent is directed to a method of establishing group calls in a wireless communication system. In particular, the '037 patent discloses a group call server supplying mobile terminals of a certain type with an indication of call type, so as to distinguish group calls from other types of calls. However, Applicants respectfully submit that the '037 patent fails to disclose imparting means for imparting a virtual mobile telephone to avatars in a shared virtual space. Moreover, Applicants respectfully submit that the subject matter of the

¹ See '080 patent, col. 3, lines 17-26.

'037 patent is unrelated to virtual reality processing. Accordingly, Applicants respectfully submit that the '037 patent fails to disclose the determination means for determining, in response to a call to a virtual mobile telephone, whether a calling party originated the call from a telephone in a shared virtual space, from a telephone in another virtual space, or from a telephone in the real world, as recited in Claim 1. The '037 patent is silent as to whether a calling party originated a call from a telephone in a shared virtual space.

Thus, no matter how the teachings of the '080 and '037 patents are combined, the combination does not teach or suggest (1) imparting means for imparting a virtual mobile telephone to each avatar in a shared virtual space; and (2) determination means for determining, in response to a call to a virtual mobile telephone, whether a calling party originated the call from a telephone in the shared virtual space, a telephone in another virtual space, or from a telephone in the real world, as recited in Claim 1. Accordingly, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and that the rejection of Claim 1 (and dependent Claims 2-4) should be withdrawn.

Claim 8 recites limitations analogous to the limitations recited in Claim 1. Accordingly, for the reasons stated above for the patentability of Claim 1, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and that the rejection of Claim 8 (and dependent Claims 9-11) should be withdrawn.

Claim 5 is directed to a conversation support system for supporting a plurality of users in having a virtual conversation in a shared virtual space built and provided on a computer network, comprising, *inter alia*: (1) enrolling means for enrolling an avatar of a logged-in user into the shared virtual space; (2) imparting means for imparting a virtual public telephone usable by any enrolled avatar to the shared virtual space at a predetermined place; (3) determination means for determining, in response to a call to the virtual public telephone,

whether a calling party originated the call from a telephone in the shared virtual space, from a telephone in another virtual space, or from a telephone in the real world.

Applicants respectfully submit that the '080 patent fails to disclose imparting means for imparting a virtual public telephone usable by any enrolled avatar to the shared virtual space at a predetermined place. The '080 patent is silent regarding any virtual public telephone in a shared virtual space. Further, as admitted in the Office Action, the '080 patent fails to disclose the determination means recited in Claim 5.

As discussed above, the '037 patent fails to disclose a shared virtual space, and thus must necessarily fail to disclose the imparting means and determination means recited in Claim 1.

Thus, no matter how the teachings of the '080 and '037 patents are combined, the combination does not teach or suggest the imparting means and the determination means recited in Claim 5. Accordingly, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and that the rejection of Claim 5 (and dependent Claims 6 and 7) should be withdrawn.

Claims 12 and 18 recite limitations analogous to the limitations recited in Claim 5. Accordingly, for the reasons stated above for the patentability of Claim 5, Applicants respectfully submit that the rejections of Claim 12 (and dependent Claims 13 and 14) and Claim 18 should be withdrawn.

Claim 15 is directed to a conversation support method for supporting an activity of an avatar in a shared virtual space built and provided on a computer network, comprising: (1) receiving a request for sending a message from the avatar; (2) determining whether a destination of the message exists in the real world; and (3) executing connection processing in accordance with the determination made by the determining step.

Applicants respectfully submit that no matter how the teachings of the '080 and '037 patents are combined, the combination does not teach or suggest (1) receiving a request for sending a message from an avatar; and (2) determining whether a destination of the message exists in the real world, as recited in Claim 15. In particular, Applicants submit that the '080 patent fails to disclose that the functionality of the avatar shown in Figure 1 of the '080 patent includes requesting the sending of a message. Rather, the '080 patent merely discloses that an avatar is displayed on a called mobile phone. Moreover, the '080 and '037 patents, either singly or in proper combination, fail to disclose determining whether a destination of the message, which was requested to be sent by an avatar, exists in the real world, as recited in Claim 15. Accordingly, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and the rejection of Claim 15 (and dependent Claim 16) should be withdrawn.

Claim 20 recites limitations analogous to the limitations recited in Claim 15. Accordingly, for the reasons stated above for the patentability in Claim 15, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and that the rejection of Claim 20 should be withdrawn.

Claim 17 is directed to a conversation support method for supporting an activity of an avatar in a shared virtual space built and provided on a computer network, comprising: (1) receiving a request for sending a message from a telephone of a user in the real world to a public telephone network in the real world, wherein the user is not logged into the shared virtual space; (2) determining whether a destination of the message exists in the shared virtual space; and (3) if the determining step determines that the destination of the message exists in the shared virtual space, sending the message to the avatar.

Applicants respectfully submit that, no matter how the teachings of the '080 and '037 patents are combined, the combination does not teach or suggest determining whether a

destination of a message, wherein the request for sending the message originated from a telephone of a user in the real world, exists in a shared virtual space. The '080 and '037 patents do not disclose determining whether a destination of a message exists in a shared virtual space. Accordingly, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and that the rejection of Claim 17 should be withdrawn.

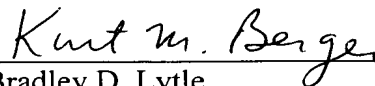
Claim 21 recites limitations analogous to the limitations recited in Claim 17. Accordingly, for the reasons stated above for the patentability of Claim 17, Applicants respectfully submit that a *prima facie* case of obviousness has not been established and that the rejection of Claim 21 should be withdrawn.

Thus, it is respectfully submitted that independent Claims 1, 5, 8, 12, 15, 17, 18, 20, and 21 (and all associated dependent claims) patentably define over any proper combination of the '080 and '037 patents.

Consequently, in view of the present amendment and in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The present application is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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